

No. 23-4509

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF AMERICA *Plaintiff-Appellee,*

Versus

RUSSELL LUCIUS LAFFITTE..... *Defendant-Appellant.*

**APPELLEE'S MOTION TO
EXCEED LENGTH LIMITATIONS**

COMES NOW the United States of America, by and through its undersigned counsel, and moves this Honorable Court to grant the United States leave to exceed the 5,200-word limit allowed by Federal Rule of Appellate Procedure 27(d)(2)(A) when filing its forthcoming response to Appellant Russell Lucius Laffitte's Motion for Release Pending Appeal. Counsel for Laffitte consents to this motion.

Good cause exists to exceed the word limit in Rule 27. Laffitte's motion—which itself exceeded the length limitation with the consent of the Government—sets forth multiple lengthy arguments and has cited extensively to significant portions of the trial transcript, affidavits, juror notes, orders, and other material from the record. The Government must discuss each issue and the related portions of the record in detail in

its response.

The undersigned anticipates its response to Laffitte's Motion for Release Pending Appeal will be no more than 8,200 words, excluding those exemptions enumerated in Rule 32(f).

For the foregoing reasons, the United States respectfully requests this Court grant the Motion to Exceed Length Limitations for the Government's response to Laffitte's Motion for Release Pending Appeal.

Respectfully submitted,

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